UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

CITY OF MADISON,)
Plaintiff,)
v.) Case No. 3:15-CV-101
UBER TECHNOLOGIES, INC.))) JUDGE CRABB
Defendant.))
)

<u>DEFENDANT UBER TECHNOLOGIES, INC.'S MOTION TO DISMISS</u> <u>PLAINTIFF'S COMPLAINT</u>

Defendant Uber Technologies, Inc. moves this Court to dismiss Plaintiff City of Madison's Complaint pursuant to Federal Civil Rule 12(b)(6). A brief in support of this motion is filed concurrently herewith.

Respectfully submitted,

HALLING & CAYO, S.C.

By:/s/Michael Schaalman
Michael H. Schaalman (# 1015424)
mhs@hallingcayo.com
Jeremy P. Levinson (# 1026359)
jpl@hallingcayo.com
Patrick T. O'Neill (# 1079079)
pto@hallingcayo.com
HALLING & CAYO, S.C.
320 East Buffalo St., Suite 700
Milwaukee, Wisconsin 53202
(414) 271.3000 (telephone)
(414) 271.3841 (facsimile)

Of Counsel:
Douglas R. Cole (Ohio 0070665)
drcole@organcole.com
Carrie M. Lymanstall (Ohio 0084393)
cmlymanstall@organcole.com
ORGAN COLE LLP
1330 Dublin Road
Columbus, OH 43215
614.481.0900 (telephone)
614.481.0904 (facsimile)
Admitted pro hac vice

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed electronically with the Clerk of the Court to be served to all counsel of record via operation of the Court's electronic filing system this 30th day of March 2015.

/s/ Michael Schaalman

One of the Attorneys for Defendant Uber Technologies, Inc.